

Certified Validation Report, Part A: Provided by Validator

Audit Information

Water System Name: California American Water Company - Sacramento District – Lincoln Oaks

Public Water System Identification (PWSID)¹: CA3410031

¹List only 1 PWSID, which should match the PWSID on the FWAS Instructions Tab. For Special cases where multiple water systems are connected with permanent two-way interties, list those additional PWSIDs in the **Notes** below and describe the water distribution system(s) configuration.

PWSID and Water System Configuration Notes (Provided to Validator by Water System):

Audit Period: Calendar Year 2019

Validation Date: 11/12/2021

Sufficient Supporting Documents Provided: Yes

Validation Findings & Confirmation Statement

Key Audit Metrics:

Data Validity Score:	63	Data Validity Band (Level):	Band III (51-70)	Real Loss:	0.66	gal / conn / day
Non-revenue water as percent of cost of operating system:			3.7%	Apparent Loss:	8.18	gal / conn / day
				ILI:	0.05	

Certification Statement by Validator:

This water loss audit report has been Level 1 validated per the requirements of California Code of Regulations Title 23, Division 2, Chapter 7 and the California Water Code Section 10608.34.

All recommendations on volume derivation and Data Validity Grades were incorporated into the water audit. ☒

If not, rejected recommendations are included here:

Validator Information

Water Audit Validator: Drew Blackwell Qualifications: Water Audit Validator Certificate issued by the CA-NV Section of the AWWA

Certified Validation Report, Part B: Provided by Utility

Water System Name: California American Water Company - Sacramento District – Lincoln Oaks

Public Water System Identification (PWSID)²: CA3410031

²List only 1 PWSID, which should match the PWSID on the FWAS Instructions Tab. For Special cases where multiple water systems are connected with permanent two-way interties, those additional PWSIDs should have been listed in the Notes section on Page 1 by the Validator.

Water Audit & Water Loss Improvement Steps:

1. Steps Taken: Water System to identify steps taken in the preceding 3 years to increase data validity, reduce real loss, and reduce apparent loss as informed by the annual validated water audit:

Click or tap here to enter text.

Customer meter changes due to length of service. Purchase of large meter testing equipment.

2. Planned Steps (OPTIONAL): If your audit reflects negative real losses or the cost of non-revenue water is greater than 100% of the operating costs (issues for which your audit will not meet code requirements), you will be asked what steps you are planning in the coming year to address these issues. If you already know what steps you plan to take, you may list them here. If not, please prepare a response within 90 days (23 CCR Section 638.6(a)).

This revised Certified Validation Report has been prepared in response to a letter dated, August 12, 2021, indicating the subject water audit and reporting year did not meet the following validated water loss audit acceptance criteria:

- Real losses are less than zero. CCR § 638.6(a)(2)(A).

A subsequent review (Production records) was conducted and found minor revisions on the water supply data as well as the Unbilled unmetered Authorized Consumption volume.

3. Certification Statement by Utility Executive:

This water loss audit report meets the requirements of California Code of Regulations Title 23, Division 2, Chapter 7 and the California Water Code Section 10608.34 and has been prepared in accordance with the method adopted by the American Water Works Association, as contained in their manual, *Water Audit and Loss Control Programs, Manual M36, Fourth Edition* and in the Free Water Audit Software version 5.

Executive Name (Print)

Executive Position

Signature

Date

Click or tap here to enter text.

Click or tap here to enter text.

Click or tap to enter a date.

S. Ardie Foster

Director Northwest

[Signature]

11/12/2021

FW: The 2019 Validated Water Loss Audit Report for California American Water Company - Sacramento District, PWSID CA3410031

Patrick R Pilz <Patrick.Pilz@amwater.com>

Thu 8/12/2021 6:49 PM

To: Drew Blackwell <drew.blackwell@cavanaughhsolutions.com>

Cc: Audie Foster <Audie.Foster@amwater.com>; John H Abbott <john.abbott@amwater.com>; Geoffrey Williamson <Geoff.Williamson@amwater.com>; Monica H Na <monica.na@amwater.com>; Mark C Reifer <Mark.Reifer@amwater.com>; Stephen San Nicolas <Stephen.SanNicolas@amwater.com>; Edward A Simon <Edward.Simon@amwater.com>

📎 1 attachments (122 KB)

The 2018 Validated Water Loss Audit Report for California American Water Company - Sacramento District, PWSID CA3410017;

Hello Drew –

We received the attached 2 notices from DWR rejecting 2 WaterLoss Reports for Sacramento's Antelope and Parkway for years 2018 and 2019 due to them showing a negative NRW value. I remember Jay Burnett mentioning the negative NRW in the past for Sacramento areas but I thought we figured out a solution prior to validation and submitting. Does your team recall these and would we have submitted a validated report showing a negative NRW value?

Thanks for any insights your team recalls

Patrick

Patrick Pilz
Sr. Mgr Field Operations
California American Water
655 West Broadway, #1410
San Diego, CA 92101

Office: 619 446 4783
Cell: 619 415 1170
Internal 7-600-4783
patrick.pilz@amwater.com

From: Ly, Krista@DWR <Krista.Ly@water.ca.gov>

Sent: Thursday, August 12, 2021 11:45 AM

To: stephen.foster@amwater.com

Cc: John H Abbott <John.Abbott@amwater.com>; Mark C Reifer <Mark.Reifer@amwater.com>; Sayed Rohani Rohani <Sayed.Rohani@amwater.com>; Stephen San Nicolas <Stephen.SanNicolas@amwater.com>; Patrick R Pilz <Patrick.Pilz@amwater.com>; John H Abbott <John.Abbott@amwater.com>

Subject: The 2019 Validated Water Loss Audit Report for California American Water Company - Sacramento District, PWSID CA3410031

EXTERNAL EMAIL: The Actual Sender of this email is Krista.Ly@water.ca.gov "Think before you click!".

STATE OF CALIFORNIA – CALIFORNIA NATURAL RESOURCES AGENCY

GAVIN NEWSOM, Governor



DEPARTMENT OF WATER RESOURCES

1416 NINTH STREET, P.O. BOX 942836
SACRAMENTO, CA 94236-0001
(916) 653-5791

August 12, 2021

Subject: The 2019 Validated Water Loss Audit Report for California American Water Company - Sacramento District, PWSID CA3410031

Dear California American Water Company - Sacramento District Representative,

The Department of Water Resources (DWR) has reviewed the California American Water Company - Sacramento District 2019 Validated Water Loss Audit Report for public water system CA3410031 that was submitted 9/9/2020 7:21 AM.

Per Title 23 of the California Code of Regulations (CCR) Section 638.6, DWR shall evaluate submitted validated water loss audit reports to meet specific criteria. Our review finds that the report does not address code requirements (attached) for one or more of the following reasons (marked with an X):

	Validated Water Loss Audit Acceptance Criteria
	The submittal should span 12 months on an annual or fiscal year basis. CCR § 638.5(a)
	The annual reports submitted through the WUE data portal should be uploaded in two separate files. 1. water loss audit spreadsheet format generated from the AWWA Free Water Audit Software 2. PDF file format containing all the items detailed in CCR 638.5 (b). Your validator can advise you on this topic.
	Your Water Loss Audit spreadsheet is missing/has an incorrect public water system identification number (PWSID). It is essential that the PWSID is included on the instruction page of the spreadsheet so that the specific system being audited can be identified and tracked. See state/federal convention of "CA" followed by a seven digit code at https://sdwis.waterboards.ca.gov/PDWW . CCR 638.5 (b).
	Include information identifying steps taken by the urban retail water supplier in the preceding 3 years to increase the validity of data entered into the final audit, reduce the volume of apparent losses, and reduce the volume of real losses, as informed by the annual validated water audit. CCR 638.5 (b)(3)
	Submit a separate AWWA Free Water Audit Software spreadsheet worksheet meeting the requirements in subsection (b)(1) for each potable water system. A combined water audit and report can be submitted for only those water systems that are interconnected by permanent 2-way interties. If the water loss report is for water systems connected by interties that are open permanently, please list just one PWSIDs in the AWWA spreadsheet but in the General Comments tab of the spreadsheet and PDF, please list all the PWSIDs and explain the setup/configuration of the interties. Your validator can advise you on this topic. CCR § 638.5(c)
	The Report needs to be properly validated by a qualified validator. CCR § 638.6(a)(1)
X	Real losses are less than zero. Your validator can advise you on this topic. CCR § 638.6(a)(2)(A)
	The cost of the non-revenue water is greater than 100% of operating costs. Your validator can advise you on this topic. CCR § 638.6(a)(2)(B)

You have 90 days from the date of this letter to resubmit your report based on CCR Section 638.6 addressing Validated Water Loss Audit Acceptance Criteria.

Section 638.6(b): If the Department does not accept a Report as described in subsection (a), the Department shall return the Report to the urban retail water supplier. The urban retail water supplier shall resubmit a completed Report within 90 days of a Report being returned.

All water loss audit reports submitted to DWR are posted at this website:
<https://wuedata.water.ca.gov>.

You can resubmit your report using DWR's WUEdata portal located at:
<https://wuedata.water.ca.gov/secure>

Please also note that the State Water Resources Control Board (SWRCB) is only using DWR data from water system audits reports that meet requirements. Please address the missing information so that your audit can be accepted by DWR. Once the audit is approved, the SWRCB can use that data to calculate water system specific water loss standards. More information on the SWRCB's process and contact information can be found here:

https://www.waterboards.ca.gov/water_issues/programs/conservation_portal/water_loss_control.html

Other Pertinent Information

All listserv announcements about annual water loss reporting, webinars and recordings, FAQs and other materials are available at this link:
<https://tinyurl.com/DWR-Water-Loss-Docs>.

If you would like to be added to our water loss listserv to receive information on our 3rd Thursday monthly webinar series or other announcements related to water loss and leak detection, please sign up at this link: <https://tinyurl.com/DWR-Water-Loss-listserv>

Please continue to use AWWA Free Water Audit Software (FWAS) version 5.0 for future submittals. DWR will give several months of advance notification (through our website and listserv messaging) about when our submittal system will be ready to accept FWAS v6.0.

If you have any questions, please contact me at nirmala.benin@water.ca.gov or 916-813-5595.

Sincerely,

Nirmala Benin

Nirmala Benin
Water Use Efficiency Branch
California Department of Water Resources

Attachment

Source: <https://govt.westlaw.com/calregs/Document/IECFD4F5BC02E41D5AC7854B0DC086F2D?originationContext=document&transitionType=StatuteNavigator&needToInjectTerms=False&viewType=FullText&contextData=%28sc.Default%2>

§ 638.5. Audit Reporting Requirements.

23 CA ADC § 638.5 BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS

Barclays Official California Code of Regulations [Currentness](#)

Title 23. Waters

Division 2. Department of Water Resources

Chapter 7. Water Loss Audits and Water Loss Control Reporting

23 CCR § 638.5

§ 638.5. Audit Reporting Requirements.

(a) Not later than October 1, 2017, and by October 1 of every year thereafter, urban retail water suppliers shall submit a Level 1 validated Report to the Department. The Report shall include data spanning 12 consecutive months, as follows:

(1) For utilities that prefer to provide Reports on a calendar year basis the reporting period shall be for calendar year 2016 and annually thereafter.

(2) For utilities that prefer to provide Reports on a fiscal year basis that is not on the calendar year, the first reporting period shall be for their 2016-2017 fiscal year and annually thereafter.

(b) Reports under subsection (a) shall be submitted in two separate files. One file shall be in a complete and fully operational water loss audit spreadsheet format generated from the AWWA Free Water Audit Software and contain the water audit information specified in subsection (1) below. The second file shall be in PDF format and contain the information specified in subsections (2)-(4) below:

(1) System-specific data entered into each field in the water loss audit spreadsheet worksheets of the AWWA Free Water Audit Software, with a DVS.

(2) In 2017, information identifying steps taken by the urban retail water supplier in the previous year to increase the validity of data entered into the final audit, reduce the volume of apparent losses, and reduce the volume of real losses, as informed by the annual validated water audit.

(3) Beginning in 2018, information identifying steps taken by the urban retail water supplier in the preceding 3 years to increase the validity of data entered into the final audit, reduce the volume of apparent losses, and reduce the volume of real losses, as informed by the annual validated water audit.

(4) A statement confirming the Level 1 validation of the submitted water loss audit, including the validation findings, and documenting the following:

(A) Identification of the water audit validator.

(B) Qualification of the water audit validator.

(C) Date of the Level 1 validation review.

(5) The following Water Loss Audit Certification Statement, signed by the chief financial officer, the chief engineer or the general manager of an urban retail water supplier:

"This water loss audit report meets the requirements of California Code of Regulations Title 23, Division 2, Chapter 7 and California Water Code Section 10608.34 and has been prepared in accordance with the methods prescribed therein."

(c) In the case of urban retail water suppliers with two or more separate public potable water systems, the urban retail water supplier shall submit a separate AWWA Free Water Audit Software spreadsheet worksheet meeting the requirements in subsection (b)(1) for each potable water system.

(d) Reports required under subsection (a) shall be submitted using the Department's Water Use Efficiency Data online submittal tool at https://wuedata.water.ca.gov/secure/login_auth.asp.

Note: Authority cited: Section 10608.34, Water Code. Reference: Section 10608.34, Water Code.

HISTORY

1. New section filed 1-24-2018; operative 1-24-2018 pursuant to Government Code section 11343.4(b)(3) (Register 2018, No. 4).

2. Change without regulatory effect renumbering section 700.5 to new section 638.5 filed 2-22-2018 pursuant to section 100, title 1, California Code of Regulations (Register 2018, No. 8).

This database is current through 7/16/21 Register 2021, No. 29

23 CCR § 638.5, 23 CA ADC § 638.5

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